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October 13, 2020

BY ECF

Magistrate Judge James Orenstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Government Employees Insurance Company, et al. v.
Trinity Medicine, P.C., et al.
EDNY, Case No. 1:20-cv-03080-NGG-JO

Dear Judge Orenstein:

This firm represents in the above referenced action Defendants Bitang Li, LAC and Betty Acupuncture P.C. (“Betty,” Dr. Li’s professional corporation). One behalf of those defendants we respectfully request an enlargement of time to answer to Plaintiffs’ complaint, to Monday, October 19, 2020. Plaintiff has consented to this request.

Pursuant to Your Honor’s Rules, I further state: (1) that the original deadlines for Dr. Li and Betty to answer Plaintiffs’ complaint was September 1 and 2, 2020, respectively (my firm was retained on September 11); (2) that such deadlines never have previously been extended; (3) as noted above, Plaintiff’s counsel consents to this request; (4) the requested adjournment does not affect any other currently scheduled dates; and (5) I am requesting this enlargement of time in order to permit this defendants to interpose an answer in light of the fact that ongoing settlement discussions have not yet been fruitful.

Thank you for your consideration and attention to this matter.

Respectfully yours,

/s/ Lloyd M. Eisenberg

Lloyd M. Eisenberg

cc: All Counsel of Record (by ECF)